

1 Richard K. Abdallah, Esq. (SBN 60380)  
2 ABDALAH LAW OFFICES  
3 A Professional Law Corporation  
4 3031 Stanford Ranch Rd., Ste. 2-210  
Rocklin, CA 95765  
Tel: (408) 480-3239  
Email: *rabdallah@abdalahlaw.com*

Attorney for Creditor Julie Cliff

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 In re: ) CASE NO. 22-50907 MEH  
11 )  
12 VINH DUC NGUYEN, aka ) **DECLARATION OF**  
13 VINCE NGUYEN, ) **RICHARD K. ABDALAH IN**  
14 ) **SUPPORT OF OPPOSITION**  
15 ) **TO MOTION FOR**  
16 ) **AUTHORITY TO ENTER**  
17 ) **INTO AGREEMENT**  
18 ) **CONCERNING INTEREST**  
19 ) **IN REAL PROPERTY**  
Debtor. ) **SUBJECT TO OVERBID,**  
\_\_\_\_\_) **AND FOR APPROVAL OF**  
 ) **DEBTOR'S SETTLEMENT**  
 ) **AND GLOBAL RELEASE**  
 ) **WITH PAUL NGUYEN;**  
 ) **REQUEST FOR HEARING**

I, Richard K. Abdallah, declare:

22        Except for those matters stated on information and belief, which I believe to  
23        be true, I have personal knowledge of the facts stated herein and, if called as a  
24        witness, I could and would competently testify thereto.

1. I am the attorney of record for Creditor Julie Cliff in the above entitled action.
2. Empire Investments, LLC, is a limited liability company organized and existing under the laws of the State of Wyoming, and registered to do business in the State of California. Empire Investments, LLC, is a shell limited liability company under the sole control of Vinh Nguyen and his wife, Teri Nguyen, and it has no other business dealings other than the purported ownership of the subject residential real property. Justin Nguyen, the purported manager of Empire Investments, LLC, is Debtor's son. The address and telephone number provided for Justin Nguyen is actually the address and personal cellular telephone number of Debtor. (Doc. No. 29, at 53; Doc. No. 42-3, at 3.) <sup>1</sup>
3. The subject residential property was originally owned by Vinh D. Nguyen and Teri H. Nguyen, Trustees of the Nguyen-Ha Living Trust, dated December 10, 2004. The property of the trust was under the sole control of Vinh Nguyen and Teri Nguyen.

<sup>1</sup> We must add that Debtor has provided the court with an incorrect home address. Debtor does not reside at 15520 Quito Road, Saratoga, California. (Doc. No. 1.) He actually resides at 1255 Blewett Avenue, San Jose, California. (Ex. D to Decl. of R. Abdallah.)

4. On August 26, 2011, Vinh Nguyen and Teri Nguyen recorded a Grant Deed transferring the residential real property from the trust which he owns and controls to Empire Investments, LLC, which he also owns and controls. (Doc. No. 29, at 50; see also Case No. 22-50645, Doc. No. 76, at 2.) Empire Investments, LLC, uses the same office address as Debtor, 1314 Lincoln Ave., Ste. 2E, San Jose, California. (Doc. No. 1.) Debtor Vinh Nguyen is designed as the agent for service of process of Empire Investments, LLC. (Ex. A.) Debtor signs legal documents on behalf of Empire (Ex. B to Decl. of R. Abdalah.) He also brings claims pertaining to the residential real property himself, purportedly as attorney for his own business entity. (Empire Investments, LLC, v. Paul Nguyen, Santa Clara Cty. Sup. Ct. No. 21CV379828, 22CV398824, and Empire Investments, Inc. v. Art Mar, Santa Clara Cty. Sup. Ct. No. 20CV375104.)
5. The books, records and financial statements of Empire Investments, LLC, are held by Debtor Vinh Nguyen. (Case No. 22-50645, Doc. No. 59 at 14.) Teri Nguyen, Debtor's spouse, is represented to be the sole manager of Empire Investments, LLC. (Id.) There are no other investors or owners.

1           6. Debtor Vinh Nguyen also paid the attorney's fees for Empire  
2           Investment, LLC's Chapter 11 bankruptcy filing. (Case No. 22-50645,  
3           Doc. No. 59 at 11.) The attorney's fees were paid by Catina  
4           Investment, LLC, another shell company, organized in another state,  
5           under the sole ownership and control of Debtor Vinh Nguyen. (Id., and  
6           Ex. C to Decl. of R. Abdalah.) Basically, Debtor Vinh Nguyen uses  
7           Empire Investments, LLC, "as a mere conduit" for his own affairs.  
8

9           I declare under penalty of perjury pursuant to the laws of the State of  
10           California that the matters stated herein are true and correct, and that this  
11           declaration was executed in Rocklin, California, on February 3, 2023.  
12  
13

14           s/Richard K. Abdalah  
15           Richard K. Abdalah, Esq.  
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Exhibit A

Case: 22-50907 Doc# 160-1 Filed: 02/03/23 Entered: 02/03/23 16:52:36 Page 5  
of 17

SK  
FILEDJM  
Secretary of State  
State of California

OCT 19 2015

1 PC  
This Space For Office Use OnlyFor questions about this form, go to [www.sos.ca.gov/business/be/filing-tips.htm](http://www.sos.ca.gov/business/be/filing-tips.htm)

## LLC Name to be used for this LLC in California

① a.

LLC Name

EMPIRE INVESTMENTS, LLC

List the LLC name you use now (exactly as listed on your certificate of good standing)

b.

Alternate Name

EMPIRE INVESTMENTS TEAM, LLC

If the LLC name in Item 1a does not comply with California Corporations Code section 17701.08; list an alternate name to be used in California exactly as it is to appear on the records of the California Secretary of State. The alternate name **must** include: LLC, L.L.C., Limited Liability Company, Limited Liability Co., Ltd. Liability Co. or Ltd. Liability Company; and **may not** include: bank, trust, trustee, incorporated, inc., corporation, or corp., insurer, or insurance company. For general entity name requirements and restrictions, go to [www.sos.ca.gov/business/be/name-availability.htm](http://www.sos.ca.gov/business/be/name-availability.htm).

## LLC History

②

a. Date your LLC was formed (MM, DD, YYYY):

05/23/11

b. State, country or other place where your LLC was formed:

Wyoming

c. Your LLC currently has powers and privileges to conduct business in the state, country or other place listed above.

**Service of Process** (List a California resident or a California registered corporate agent that agrees to be your initial agent to accept service of process in case your LLC is sued. You **may** list any adult who lives in California. You **may not** list an LLC as the agent. **Do not** list an address if the agent is a California registered corporate agent as the agent's address for service of process is already on file.)

③ a. VINH NGUYEN

Agent's Name

b. 1361 S. Winchester Blvd. Ste M1 San Jose CA 95128

Agent's Street Address (if agent is not a corporation) - Do not list a P.O. Box City (no abbreviations) State Zip

If the agent listed above has resigned or cannot be found or served after reasonable attempts, the California Secretary of State will be appointed the agent for service of process for your LLC.

## LLC Addresses

④ a. 12329 Kosich Place, Saratoga

CA 95070

Street Address of Principal Executive Office - Do not list a P.O. Box

City (no abbreviations)

State

Zip

b. 12329 Kosich Place, Saratoga

CA 95070

Street Address of Principal Office in California, if any - Do not list a P.O. Box

City (no abbreviations)

State

Zip

c.

Mailing Address of Principal Executive Office, if different from 4a or 4b

City (no abbreviations)

State

Zip

## Read and sign below:

I am authorized to sign this document under the laws of the state, country or other place where this LLC was formed.

Sign here

JUSTIN V. NGUYEN

Print your name here

Member

Your business title

Make check/money order payable to: **Secretary of State**

By Mail

Drop-Off

Upon filing, we will return one (1) uncertified copy of your filed document for free, and will certify the copy upon request and payment of a \$5 certification fee.

Secretary of State  
Business Entities, P.O. Box 944228  
Sacramento, CA 94244-2280Secretary of State  
1500 11th Street, 3rd Floor  
Sacramento, CA 95814





**Secretary of State  
Statement of Information  
(Limited Liability Company)**

LLC-12A

FILED

In the office of the Secretary of State  
of the State of California

MAY 23, 2018

This Space For Office Use Only

**1. Limited Liability Company Name** (Enter the exact name of the LLC. If you registered in California using an alternate name, [see instructions](#).)

EMPIRE INVESTMENTS TEAM, LLC

<b>2. 12-Digit Secretary of State File Number</b> 201529410414	<b>3. State, Foreign Country or Place of Organization</b> (only if formed outside of California) WYOMING
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**4. Business Addresses**

a. Street Address of Principal Office - Do not list a P.O. Box 1302 Lincoln Ave., Suite 204	City (no abbreviations) San Jose	State CA	Zip Code 95125
b. Mailing Address of LLC, if different than item 4a 1302 Lincoln Ave., Suite 204	City (no abbreviations) San Jose	State CA	Zip Code 95125
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box 1302 Lincoln Ave., Suite 204	City (no abbreviations) San Jose	State CA	Zip Code 95125

If no managers have been appointed or elected, provide the name and address of each member. At least one name and address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A ([see instructions](#)).

a. First Name, if an individual - Do not complete Item 5b Justin	Middle Name Vu	Last Name Nguyen	Suffix
b. Entity Name - Do not complete Item 5a			
c. Address 1302 Lincoln Ave., Suite 204	City (no abbreviations) San Jose	State CA	Zip Code 95125

**6. Service of Process** (Must provide either Individual OR Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation) Vince	Middle Name	Last Name Nguyen	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box 1302 Lincoln Ave., Suite 204	City (no abbreviations) San Jose	State CA	Zip Code 95125

CORPORATION – Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 6a or 6b

**7. Type of Business**

a. Describe the type of business or services of the Limited Liability Company

**INVESTMENT IN REAL ESTATE**

**8. Chief Executive Officer, if elected or appointed**

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

**9. The Information contained herein, including any attachments, is true and correct.**

05/23/2018

Vince Nguyen

ATTORNEY

Date

Type or Print Name of Person Completing the Form

Title

Signature

**Return Address (Optional)** (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. [SEE INSTRUCTIONS BEFORE COMPLETING](#).)

Name:

1

Company:

Address:

City/State/Zip:

1



**Secretary of State  
Statement of Information  
(Limited Liability Company)**

LLC-12A

FILED

In the office of the Secretary of State  
of the State of California

**IMPORTANT — Read instructions before completing this form.**

**Filing Fee — \$20.00**

**Copy Fees** — First page \$1.00; each attachment page \$0.50;  
Certification Fee - \$5.00 plus copy fees

NOV 07, 2021

**This Space For Office Use Only**

**1. Limited Liability Company Name** (Enter the exact name of the LLC. If you registered in California using an alternate name, [see instructions](#).)

EMPIRE INVESTMENTS TEAM, LLC

**2. 12-Digit Secretary of State File Number**  
201529410414

**3. State, Foreign Country or Place of Organization** (only if formed outside of California)  
WYOMING

**4. Business Addresses**

a. Street Address of Principal Office - Do not list a P.O. Box 1314 Lincoln Ave, Ste 2E	City (no abbreviations) San Jose	State CA	Zip Code 95125
b. Mailing Address of LLC, if different than item 4a 1314 Lincoln Ave, Ste 2E	City (no abbreviations) San Jose	State CA	Zip Code 95125
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box 1314 Lincoln Ave, Ste 2E	City (no abbreviations) San Jose	State CA	Zip Code 95125

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A ([see instructions](#)).

a. First Name, if an individual - Do not complete Item 5b Justin	Middle Name Vu	Last Name Nguyen	Suffix
b. Entity Name - Do not complete Item 5a			
c. Address 1314 Lincoln Ave, Ste 2E	City (no abbreviations) San Jose	State CA	Zip Code 95125

**6. Service of Process** (Must provide either Individual **OR** Corporation.)

INDIVIDUAL — Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is <b>not</b> a corporation) VINH	Middle Name DUC	Last Name NGUYEN	Suffix
b. Street Address (if agent is <b>not</b> a corporation) - <b>Do not enter a P.O. Box</b> 1314 Lincoln Ave, Ste 2E	City (no abbreviations) San Jose	State CA	Zip Code 95125

CORPORATION — Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) — Do not complete Item 6a or 6b

**7. Type of Business**

a. Describe the type of business or services of the Limited Liability Company  
**real estate leasing**

**8. Chief Executive Officer, if elected or appointed**

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

**9. The Information contained herein, including any attachments, is true and correct.**

11/07/2021

VINH DUC NGUYEN

Attorney

Date

Type or Print Name of Person Completing the Form

Title

Signature

**Return Address (Optional)** (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. [SEE INSTRUCTIONS BEFORE COMPLETING](#).)

Name:

1

Company:

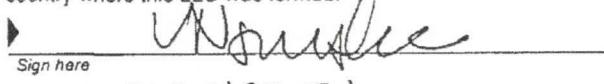
Address:

City/State/Zip:

1



201229010128

LLC-5	Application to Register a Foreign Limited Liability Company (LLC)		
<p>To register an LLC from another state or country in California, fill out this form, and submit for filing along with:</p> <ul style="list-style-type: none"> <li>- A \$70 filing fee,</li> <li>- A certificate of good standing from the agency where your LLC was formed originally, and</li> <li>- A separate, non-refundable \$15 service fee, if you drop off the completed form.</li> </ul> <p><i>Important!</i> LLCs in California may have to pay a minimum \$800 yearly tax to the Franchise Tax Board.</p> <p>LLCs that provide professional services cannot register in California.</p>			
FILED in the office of the Secretary of State of the State of California			
OCT 10 2012			
This Space For Office Use Only			
For questions about this form, go to <a href="http://www.sos.ca.gov/business/be/filing-tips.htm">www.sos.ca.gov/business/be/filing-tips.htm</a>			
<p><b>① Name to be used for this LLC in California</b></p> <p><u>CATINA INVESTMENT, LLC</u></p> <p><i>proposed LLC name</i></p> <p>The name must end with: "LLC," "L.L.C.," "Limited Liability Company," "Limited Liability Co.," "Ltd. Liability Co." or "Ltd. Liability Company;" and may not include: "bank," "trust," "trustee," "incorporated," "inc.," "corporation," or "corp.," "insurer," or "insurance company."</p>			
<p><b>② LLC History</b></p> <p>a. If the proposed LLC name you listed above is different than the LLC name you use now (as listed on your certificate of good standing), list the complete LLC name used now: N/A</p> <p>b. Date your LLC was formed (MM, DD, YYYY): <u>April 4, 2012</u></p> <p>c. State or country where your LLC was formed: <u>Nevada</u></p> <p>d. Your LLC currently has powers and privileges to conduct business in the state or country listed above.</p>			
<p><b>③ Service of Process</b></p> <p>List a California resident or a qualified 1505 corporation in California that agrees to be your agent to accept service of process in case your LLC is sued. You may list any adult who lives in California. You may not list an LLC as your agent. Do not list an address if the agent is a 1505 corporation.</p> <p>a. Agent's name: <u>Vince Nguyen, Esq.</u></p> <p>b. Agent's address: <u>1361 S. Winchester Blvd., Suite 111</u> <span style="float: right;">CA 95128</span>  <small>Street address (if agent is not a corporation)</small> <span style="float: right;">city (no abbreviations)</span> <span style="float: right;">state</span> <span style="float: right;">zip</span></p> <p>If the agent listed above has resigned or cannot be found or served after reasonable attempts, the California Secretary of State will be appointed the agent for service of process for your LLC.</p>			
<p><b>④ LLC Address</b></p> <p>a. List address for your LLC's headquarters:  <u>1000 E. William St., Suite 204</u> <span style="float: right;">NV 89701</span>  <small>Street address</small> <span style="float: right;">city (no abbreviations)</span> <span style="float: right;">state</span> <span style="float: right;">zip</span></p> <p>b. List address for your LLC's main office in California, if any:  <u>1321 S. Winchester Blvd., Suite 245</u> <span style="float: right;">CA 95128</span>  <small>Street address</small> <span style="float: right;">city (no abbreviations)</span> <span style="float: right;">state</span> <span style="float: right;">zip</span></p>			
<p><b>⑤ Read and sign below:</b></p> <p>I declare that I am the person who signed this form, and that I am authorized to do so under the laws of the state or country where this LLC was formed.</p> <p>  <span style="float: right;">10/09/12</span></p> <p><i>Sign here</i> <u>Vince Nguyen</u> <span style="float: right;">Date</span>  <i>Print your name here</i> <u>Vince Nguyen</u> <span style="float: right;">Your business title</span> <u>Manager</u></p>			
<p>Make check/money order payable to: Secretary of State</p> <p>We can give you up to 2 free certified copies of your filed form if you submit up to 2 completed copies of this form (with all attachments).</p> <p><i>By Mail</i> <span style="float: right;"><i>Drop-Off</i></span></p> <p>Secretary of State Business Entities, P.O. Box 944228 Sacramento, CA 94244-2280</p> <p>Secretary of State 1500 11th St., 3rd Floor Sacramento, CA 95814</p>			



**Secretary of State  
Statement of Information  
(Limited Liability Company)**

**LLC-12**

**21-E52265**

**FILED**

In the office of the Secretary of State  
of the State of California

SEP 01, 2021

**This Space For Office Use Only**

**1. Limited Liability Company Name** (Enter the exact name of the LLC. If you registered in California using an alternate name, [see instructions](#).)

CATINA INVESTMENT, LLC

**2. 12-Digit Secretary of State File Number**

201229010128

**3. State, Foreign Country or Place of Organization** (only if formed outside of California)

NEVADA

**4. Business Addresses**

a. Street Address of Principal Office - Do not list a P.O. Box 1302 LINCOLN AVE, STE 204	City (no abbreviations) SAN JOSE	State CA	Zip Code 95125
b. Mailing Address of LLC, if different than item 4a 1302 LINCOLN AVE, STE 204	City (no abbreviations) SAN JOSE	State CA	Zip Code 95125
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box	City (no abbreviations)	State	Zip Code

If no **managers** have been appointed or elected, provide the name and address of each **member**. At least one name **and** address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A ([see instructions](#)).

a. First Name, if an individual - Do not complete Item 5b Justin	Middle Name Vu	Last Name Nguyen	Suffix
b. Entity Name - Do not complete Item 5a			
c. Address 1302 Lincoln Ave Suite 204	City (no abbreviations) San Jose	State CA	Zip Code 95125

**6. Service of Process** (Must provide either Individual **OR** Corporation.)

INDIVIDUAL – Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is <b>not</b> a corporation) VINH	Middle Name DUC	Last Name NGUYEN	Suffix
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CORPORATION – Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) – Do not complete Item 6a or 6b

**7. Type of Business**

a. Describe the type of business or services of the Limited Liability Company

**INVESTMENT IN REAL ESTATE**

**8. Chief Executive Officer, if elected or appointed**

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

**9. The Information contained herein, including any attachments, is true and correct.**

09/01/2021

VINH DUC NGUYEN

Attorney

Date Type or Print Name of Person Completing the Form Title Signature

**Return Address (Optional)** (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. [SEE INSTRUCTIONS BEFORE COMPLETING](#).)

Name:

Company:

Address:

City/State/Zip:



**Secretary of State  
Statement of Information  
(Limited Liability Company)**

LLC-12

FILED

In the office of the Secretary of State  
of the State of California

**IMPORTANT — Read instructions before completing this form.**

**Filing Fee — \$20.00**

**Copy Fees** — First page \$1.00; each attachment page \$0.50;  
Certification Fee - \$5.00 plus copy fees

SEP 12, 2021

**This Space For Office Use Only**

**1. Limited Liability Company Name** (Enter the exact name of the LLC. If you registered in California using an alternate name, [see instructions](#).)

CATINA INVESTMENT, LLC

**2. 12-Digit Secretary of State File Number**  
201229010128

**3. State, Foreign Country or Place of Organization** (only if formed outside of California)  
NEVADA

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b. Mailing Address of LLC, if different than item 4a 1314 LINCOLN AVE. STE 2E	City (no abbreviations) SAN JOSE	State CA	Zip Code 95125
c. Street Address of California Office, if Item 4a is not in California - Do not list a P.O. Box 1314 LINCOLN AVE. STE 2E	City (no abbreviations) SAN JOSE	State CA	Zip Code 95125

**5. Manager(s) or Member(s)** If no managers have been appointed or elected, provide the name and address of each member. At least one name and address must be listed. If the manager/member is an individual, complete Items 5a and 5c (leave Item 5b blank). If the manager/member is an entity, complete Items 5b and 5c (leave Item 5a blank). Note: The LLC cannot serve as its own manager or member. If the LLC has additional managers/members, enter the name(s) and addresses on Form LLC-12A ([see instructions](#)).

a. First Name, if an individual - Do not complete Item 5b JUSTIN	Middle Name	Last Name NGUYEN	Suffix
b. Entity Name - Do not complete Item 5a			
c. Address 1314 LINCOLN AVE. STE 2E	City (no abbreviations) SAN JOSE	State CA	Zip Code 95125

**6. Service of Process** (Must provide either Individual OR Corporation.)

INDIVIDUAL — Complete Items 6a and 6b only. Must include agent's full name and California street address.

a. California Agent's First Name (if agent is not a corporation) VINH	Middle Name	Last Name NGUYEN	Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box 1314 LINCOLN AVE. STE 2E	City (no abbreviations) SAN JOSE	State CA	Zip Code 95125

CORPORATION — Complete Item 6c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) — Do not complete Item 6a or 6b

**7. Type of Business**

a. Describe the type of business or services of the Limited Liability Company

**INVESTMENT IN REAL ESTATE**

**8. Chief Executive Officer, if elected or appointed**

a. First Name	Middle Name	Last Name	Suffix
b. Address	City (no abbreviations)	State	Zip Code

**9. The Information contained herein, including any attachments, is true and correct.**

09/12/2021

VINH NGUYEN

ATTORNEY

Date

Type or Print Name of Person Completing the Form

Title

Signature

**Return Address (Optional)** (For communication from the Secretary of State related to this document, or if purchasing a copy of the filed document enter the name of a person or company and the mailing address. This information will become public when filed. [SEE INSTRUCTIONS BEFORE COMPLETING](#).)

Name:

1

Company:

Address:

City/State/Zip:

1



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  RICHARD K. ABDALAH , SBN 60380 LAW OFFICES OF 300 HARDING BLVD. STE. 203 H ROSEVILLE, CA 95678  TELEPHONE NO.: 408-480-3239 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): JULIE CLIFF		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA STREET ADDRESS: 191 N. FIRST ST. MAILING ADDRESS: 191 N. FIRST ST. CITY AND ZIP CODE: SAN JOSE, CA 95113 BRANCH NAME:		
PLAINTIFF/PETITIONER: JULIE CLIFF DEFENDANT/RESPONDENT: VINCE NGUYEN aka VINH DUC NGUYEN		CASE NUMBER: 22CV397537
<b>PROOF OF SERVICE OF SUMMONS</b>		Ref. No. or File No.:

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
  - summons
  - complaint
  - Alternative Dispute Resolution (ADR) package
  - Civil Case Cover Sheet (*served in complex cases only*)
  - cross-complaint
  - other (*specify documents*): CIVIL LAWSUIT NOTICE
3. a. Party served (*specify name of party as shown on documents served*):  
VINCE NGUYEN aka VINH DUC NGUYEN
  - b.  Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (*specify name and relationship to the party named in item 3a*):
4. Address where the party was served:  
1255 BLEWETT AVE. SAN JOSE, CA 95125
5. I served the party (*check proper box*)
  - a.  by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): (2) at (time):
  - b.  by substituted service. on (date): 5-11-2022 at (time): 10:07 AM I left the documents listed in item 2 with or in the presence of (*name and title or relationship to person indicated in item 3*):  
FEMALE, TERI HA NGUYEN , SUBJECTS WIFE, ID FROM PHOTO I RECEIVED
    - (1)  (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - (2)  (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - (3)  (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
  - (4)  I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., § 415.20). I mailed the documents on (date): 5-13-2022 from (city): SAN JOSE, CA 95155 or  a declaration of mailing is attached.
  - (5)  I attach a declaration of diligence stating actions taken first to attempt personal service.

PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:	CASE NUMBER:
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5. c.  **by mail and acknowledgment of receipt of service.** I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,

(1) on (date):  (2) from (city):

(3)  with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (*Attach completed Notice and Acknowledgement of Receipt.*) (Code Civ. Proc., § 415.30.)

(4)  to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)

d.  **by other means (specify means of service and authorizing code section):**

Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

a.  as an individual defendant.

b.  as the person sued under the fictitious name of (specify):

c.  as occupant.

d.  On behalf of (specify):

under the following Code of Civil Procedure section:

<input type="checkbox"/> 416.10 (corporation)	<input type="checkbox"/> 415.95 (business organization, form unknown)
<input type="checkbox"/> 416.20 (defunct corporation)	<input type="checkbox"/> 416.60 (minor)
<input type="checkbox"/> 416.30 (joint stock company/association)	<input type="checkbox"/> 416.70 (ward or conservatee)
<input type="checkbox"/> 416.40 (association or partnership)	<input type="checkbox"/> 416.90 (authorized person)
<input type="checkbox"/> 416.50 (public entity)	<input type="checkbox"/> 415.46 (occupant)
<input type="checkbox"/> other:	

7. Person who served papers

a. Name: PAT CURLEY

b. Address: P.O. BOX 8071, SAN JOSE, CA 95155

c. Telephone number: 408-313-3152

d. The fee for service was: \$ 160.00

e. I am:

(1)  not a registered California process server.

(2)  exempt from registration under Business and Professions Code section 22350(b).

(3)  a registered California process server:

owner  employee  independent contractor.

(ii) Registration No.: 1250

(iii) County: SANTA CLARA

8.  I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

or

9.  I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: 5-13-2022

PAT CURLEY

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

  
(SIGNATURE)

DECLARATIN OF DILIGENCE

VINCE NGUYEN aka VIN DUC NGUYEN  
V  
JULIE CLIFF  
22CV397537

ACTIONS TAKEN FIRST TOATTEMPT PERSONAL SERVICE  
VINCE NGUYEN aka VIN DUC NGUYEN

1255 BLEWETT AVE.  
5-6-2022 11:15 AM FEMALE AT DOOR ID FROM PHOTO WIFE OF SUBJECT  
CLAIM SUBJECT NOT LIVING THERE, I DIDNOT BELIEVE HER.

5-10-2022 1:35PM NO ANSWER AT DOOR

5-11-2022 10:07 AM SUBSTITUTION OF SERVICE ON WIFE OF SUBJECT

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE  
OF CALIFORNIA THAT THE FORGOING IS TRUE AND CORRECT.

5-13-2022  
PAT CURLEY



Pat Curley